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Office of The Ombudsman, Hong Kong

□□□□□□
Direct Investigation Report

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Buildings Department’s Implementation of Mandatory Window Inspection Scheme

□□□□□□□2019□8□12□
Completion Date: 12 August 2019

□□□□□□□2019□8□14□
Announcement Date: 14 August 2019

[illegible]
[illegible] **www.ombudsman.hk**[illegible]

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This report is also available on our website at www.ombudsman.hk.

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1	□□	
	□□	**1.1 – 1.3**
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2	□□□□□□□□	**2.1**
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	□□□□□□□□□	**2.6 – 2.11**
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3	□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□	
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	□□□□□	**3.4**
	□□□□□□□□□	**3.5 – 3.11**
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4	□□□□□□□□□□□□□	
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		[illegible]	4.7 – 4.9
		[illegible]	4.10
		[illegible]	4.11 – 4.14
		[illegible]	4.15 – 4.17
		[illegible]	4.18 – 4.20
5	[illegible]		5.1 – 5.3
6	[illegible]		6.1
	(I)	[illegible]	6.2 – 6.6
	(II)	[illegible]	6.7 – 6.11
	(III)	[illegible] 2012 [illegible] 2016 [illegible]	6.12 – 6.15
	(IV)	[illegible]	6.16 – 6.18
	(V)	[illegible]	6.19 – 6.23
	(VI)	[illegible]	6.24
		[illegible]	6.25
		[illegible]	6.26

[illegible]

[illegible]

[illegible] 2012 [illegible] 6 [illegible] 30 [illegible] 10 [illegible]

[illegible]

2. [illegible]

(I) [illegible]

3. [illegible] 5,800 [illegible] 35 [illegible] 2017 [illegible] 2012 [illegible] 2013 [illegible] 70% [illegible] 2014 [illegible] 59 [illegible] 2018 [illegible] 37% [illegible]

4. [illegible]

5. [illegible] 2012 [illegible] 2018 [illegible] 10 [illegible] 2018 [illegible] 400 [illegible] 42 [illegible]

(II) [illegible]

6. [illegible] 2019 [illegible] 3 [illegible] 2012 [illegible] 2018 [illegible] 49 [illegible] 10% [illegible] 95% [illegible]

(III) [illegible] *2012* [illegible] *2016* [illegible]

7. [illegible] 2012 [illegible] 2017 [illegible] 8 [illegible]

(IV) [illegible]

8. [illegible] 2015 [illegible] 8 [illegible] 2017 [illegible] 2018 [illegible] 44% [illegible] 52% [illegible] 29% [illegible] 37% [illegible]

9. [illegible]

(V) [illegible]

10. [illegible] 2017 [illegible] 2018 [illegible] 77% [illegible] 78% [illegible] 2017 [illegible] 10% [illegible] 2017 [illegible] 2018 [illegible] 2.3% [illegible] 2.2% [illegible]

11. [illegible]

(VI) [illegible]

12. [illegible] 142 [illegible] 2012 [illegible] 2017 [illegible] 10 [illegible] 2017 [illegible]

[illegible]

13. [illegible]

(1) [illegible]

(2) [illegible]

(3) [illegible]

(4) [illegible]

(5) [illegible]

(6) [illegible]

[illegible]
2019 [illegible] 8 [illegible]

Executive Summary
Direct Investigation Report

Buildings Department's Implementation of Mandatory Window Inspection Scheme

Foreword

With the amendments to the Buildings Ordinance ("BO"), the Mandatory Window Inspection Scheme ("MWIS") commenced on 30 June 2012. It is implemented by the Buildings Department ("BD") and aims to resolve the problem of dilapidated windows. Under MWIS, owners of private buildings aged 10 years or above (except domestic buildings not exceeding three storeys), who receive a statutory notice of MWIS ("the Notice") from BD, are required to arrange inspection and (where found necessary) repairs for all the windows of their buildings.

Our Findings

2. Our findings in this direct investigation reveal the following inadequacies in BD's implementation of MWIS.

(I) Implementation Progress Significantly Below Targets

3. When MWIS commenced, some 20,000 buildings were within the scope of the Scheme. BD had planned to select 5,800 target buildings, with an estimate of 35 premises in each target building, for mandatory window inspection each year. The first inspection cycle was expected to complete within five years (i.e. by mid-2017). Nevertheless, the numbers of target buildings actually selected under MWIS in 2012 and 2013 were less than 70% of the estimated figures. Due to the failure to meet the targets set for MWIS (including the fact that the average number of premises in each target building was actually 59) and the experience gained in implementing the Scheme, BD has significantly reduced the number

of target buildings since 2014 and it has stopped setting any target completion time for the first cycle of inspections. As at 2018 (i.e. more than one year after the scheduled completion of the first cycle of inspections), only 37% of buildings whose age was within the scope of MWIS were selected as target buildings.

4. In our view, the adjustment that BD made is significant compared with its original target. That would inevitably raise doubts as to whether BD had duly planned for the implementation of MWIS.

5. Figures show that accidents involving fallen windows between 2012 and 2018 mostly took place at buildings aged 10 years or above. However, based on BD's target of selecting 400 target buildings each year in 2018, it would require almost 42 years to complete the inspection of the windows of buildings which are yet to be selected as target buildings in the first inspection cycle. We consider that BD should review the number of actual target buildings selected each year and speed up listing buildings whose age is covered by MWIS as target buildings, so that the problem of dilapidated windows of old buildings can be resolved in an orderly and effective manner to ensure public safety. Where necessary, BD should allocate additional resources.

(II) Failing to Properly Monitor the Compliance with Notices

6. As at March 2019, around 10% of the Notices (totalling nearly 490,000) issued between 2012 and 2018 were not complied with, and some of them were issued when MWIS commenced. In 95% of those cases, the reason for non-compliance with the Notice was that BD had not yet received the certificate in the specified form ("the Certificate") from the Qualified Persons ("QPs") upon completion of the prescribed window inspection. In our view, BD should monitor the compliance with Notices more proactively to avoid further backlog of non-compliance cases. In particular, BD should give priority to long-time outstanding cases where the Certificate has yet to be received.

(III) Lack of Data between 2012 and 2016 for Monitoring the Work of Staff, QPs and Registered Contractors ("RCs")

7. The implementation of MWIS relies heavily on QPs and RCs to properly carry out the prescribed inspection and prescribed repair for the windows of buildings. BD has an audit check mechanism in place to monitor whether QPs and RCs have properly carried out those tasks. However, despite that the Scheme commenced in 2012, prior to 2017, BD had not compiled any data for monitoring the audit checks carried out by its staff (including whether its staff had completed the site audits in a timely manner), and whether QPs and RCs had completed the prescribed inspection and prescribed repair in accordance with the requirements of the legislations, code of practice and practice note. In our view, there were inadequacies on the part of BD in planning for MWIS and monitoring its implementation as the Department only started to maintain the relevant data some four years after the commencement of the Scheme, which led to its failure to identify and make improvement to the problem discussed in paragraph 8 below.

(IV) Time Needed to Complete Site Audits Not Meeting the Requirements in Operational Guidelines

8. Since August 2015, BD has set the time frame for completion of a site audit at two months. Nevertheless, among the selected cases that successfully went through site audits in 2017 and 2018, 44% and 52% respectively were not completed within this time frame. 29% and 37% respectively of such cases even took more than three months to complete. We consider that BD staff must endeavour to abide by the time frame stipulated in the operational guidelines for early identification of prescribed inspection and prescribed repair of windows that are defective, and for timely follow-up actions, including enforcement actions.

9. BD also argues that the above time frame for "completion of a site audit" means the Department would stop following up a case

further if the property owner does not respond within the time frame to BD's request for entry into the premises to conduct a site audit. It does not mean that all site audits must be completed within the time frame. We are doubtful of such interpretation. The literal meaning of "completion of a site audit" cannot be clearer. It means that BD staff successfully enter a selected premises and complete an inspection of the prescribed inspection and/or prescribed repair of the windows in the premises. If BD staff cannot enter a selected premises to carry out an inspection, the site audit is simply never carried out, let alone completed. If BD deems it appropriate to take follow-up actions in accordance with its interpretation above, it should revise the relevant operational guidelines to accurately reflect its actions.

(V) Effectiveness of Site Audits Affected by Failure to Enter Premises

10. For cases selected for site audit by BD in 2017 and 2018, 77% and 78% respectively were terminated because property owners either refused BD's request for a site audit or did not respond to the request. Huge resources were spent on site audits, yet for very limited effectiveness. Since 2017, BD has set a sampling ratio of 10%. Nevertheless, based on the above statistics on cases in which no site audit was carried out because of failure to gain entry into premises, site audits had only been carried out for 2.3% and 2.2% of the Certificates received by BD respectively in 2017 and 2018.

11. This Office considers that BD should explore measures to increase the success rate of its staff entering into premises for site audits so as to enhance the effectiveness of the audit check mechanism as a whole. Besides, instead of using the sampling ratio, BD should adopt the rate of actual entry into premises to carry out site audit as the benchmark to reflect the real situation of site audits.

(VI) Delay in Enforcement against Irregularities

12. Relevant statistics reveal that BD did take follow-up and enforcement actions against Owners' Corporations/property owners who had failed to comply with the Notice. Such actions included issuing warning letters and fixed penalty notices, and instigating prosecutions. Nevertheless, in 142 cases where a Notice had been served in as early as 2012 but compliance was still outstanding as at October 2017, warning letters were only issued to the owners concerned in late 2017 (after more than five years). Such delay was glaring. We consider that BD must take timely enforcement actions against owners who fail to comply with the Notice.

Recommendations

13. In the light of the above, The Ombudsman recommends that BD:

(1) conduct a comprehensive review on the implementation of MWIS and lay down practicable work targets so as to speed up listing buildings whose age is covered by MWIS as target buildings. Additional resources should also be allocated if necessary;

(2) monitor the compliance with Notices more proactively, and to clear backlog promptly and effectively;

(3) review the need to revise the definition of the time frame set in its operational guidelines regarding the completion of site audits so as to clearly reflect the Department's requirement, and remind its staff to follow up and complete site audits within the time frame specified in the operational guidelines;

(4) explore measures to increase the success rate of staff gaining entry into premises for conducting site audits, so that the effectiveness of the audit check mechanism can be enhanced as a whole;

(5) adopt the rate of actual entry into premises to carry out site audit, instead of the sampling ratio, as its work benchmark to better reflect the real situation of site audits; and

(6) take timely enforcement actions against property owners who fail to comply with the Notice.

Office of The Ombudsman
August 2019

1

[illegible]

[illegible]

1.1 [illegible] 2012 [illegible] 6 [illegible] 30 [illegible] 10 [illegible]

1.2 [illegible]

1.3 [illegible] 2018 [illegible] 4 [illegible] 27 [illegible] 7(1)(a)(ii) [illegible]

[illegible]

1.4 [illegible]

(1) [illegible]

(2) [illegible]

(3) [illegible]

(4) [illegible]

1.5 2019□5□9□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□
□□8□12□□□□□□□

2

[illegible]

2.1 [illegible]2012[illegible]6[illegible]30[illegible]

[illegible]

2.2 [illegible]10[illegible][1][illegible][2][illegible]

2.3 [illegible]

2.4 [illegible]

[illegible]

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1 [illegible](i)[illegible](ii)[illegible](iii)[illegible](iv)[illegible](v)[illegible]

2 [illegible]

2.5 [illegible]

(1) [illegible]

(2) [illegible][3][illegible]

(3) [illegible]

[3] [illegible]

□□□□□□□□□

□□□□□

2.6 □□1,500□□□□□□□□□□□□□□□□□□□□□□□□1,500□□25,000□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□2,000□□

2.7 □□□□□□□□□□□□□□□□□□□□**3.5**□□□20%□□□□□

□□□□□□□□□□□

2.8 □□□

(1) □□500,000□□□□18□□□

(2) □□□□□□□□□□□□□□□□□□□□□250,000□□

(3) □□250,000□□□□□□□□□□□□□□□□□□□□□□□□□□150,000□□

(4) □□□1,000,000□□□□□□□□□□□□□□□□□□□□□□□□□□□□500,000□□□□18□□□□□

(5) [illegible] 500,000 [illegible] 18 [illegible]

2.9 [illegible]

2.10 [illegible]

[illegible]

2.11 [illegible] 100,000 [illegible] 5,000 [illegible]

[illegible]

2.12 [illegible]

3

[illegible]

[illegible]

3.1 [illegible][4][illegible]18[illegible]2015[illegible]

[4] [illegible]

[illegible]

3.2 [illegible] 2018 [illegible] 3 [illegible]

3.3 [illegible] **2.5(2)** [illegible] 2018 [illegible] 4 [illegible]

[illegible]

3.4 [illegible] **2.5(3)** [illegible] **2.12** [illegible] **3** [illegible] **1** [illegible]

[illegible]

3.5 [illegible] **2.5(3)** [illegible] **2.12** [illegible]

[illegible]

3.6 [illegible] 2013 [illegible] 5% [illegible] 10% [illegible] 30 [illegible][5][illegible]

3.7 [illegible] 2015 [illegible] 8 [illegible] 2017 [illegible] 1 [illegible] 10% [illegible] 2018 [illegible] 6 [illegible][6][illegible]

3.8 [illegible] 5% [illegible] 10% [illegible]

[illegible]

3.9 [illegible]

3.10 [illegible]

3.11 [illegible] **2.8-2.9** [illegible]

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[5] [illegible] The Team Leaders of the District Team/Mandatory Building Inspection Sections should retrieve from the Mandatory Window Inspection Scheme Audit Check Register at weekly intervals to identify the cases within his purview to complete the audit check within 30 days after the sampled cases have been recorded in the Register.[illegible]

[6] [illegible] Team Leader should complete site audit within 2 months.[illegible]

[illegible]

3.12 [illegible] 2012 [illegible] 6 [illegible] 30 [illegible] 2015 [illegible] 6 [illegible][7] [illegible]

3.13 [illegible] 2017 [illegible] 5 [illegible] Excel [illegible]

[7] [illegible]

4

[illegible]

[illegible]

4.1 [illegible] 5,800 [illegible] 35 [illegible] 2017 [illegible] **2.2** [illegible]

[illegible]

4.2 [illegible]

[illegible]

4.3 [illegible] 35 [illegible] **4.1** [illegible] 59 [illegible] 2014 [illegible]

[illegible]

4.4 □□2012□2018□□□□□□□□□□□□□□□□□□□□□□□□□□ **1**□

□1□□□□□□□□□□□□□□

□□	□□□□ □□□ ***(a)***	□□□□ □□□ ***(b)***	□□□ ***(c)***
2012 (6□30□□)	4,350	2,823	65%
2013	5,800	3,943	68%
2014	1,000	1,018	102%
2015	650	663	102%
2016	500	500	100%
2017	400	464	116%
2018	400	435	109%

4.5 □□□□□□□□□□□□□□□□□□**3.1**□□**2.12**□□2017□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□

4.6 □□□□2018□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□**2**□

□2□□□□□□□□□□□□□□□□□
□□□□□□□□□□□□□□□□□□□

□□□□	□□**2018**□**12**□	□□□□□□□□□□□□□□

	□□□□□□□□□□□□□□□□□□□□	□□　□□□	□□□
10-19	3,713	492	13%
20-29	5,316	2,340	44%
30-39	5,371	2,286	43%
≥40	12,137	4,728	39%
□□	**26,537**	**9,846**	**37%**

□□□□□□□□□□□□□□□□□

4.7 □□□□□□2012□2018□□□□□□□□□□□□□□□□□□□□□□□□□□□□2019□3□□□□□□□□□□**3**□

□3□□□□□□□□□□□□□□

□□	□□□　□□□□□□□□□ ***(a) (=(b)+(d)+(f))***	□□**2019**□**3**□				
		(a)□□□□□□□□□□□		***(a)***□□□□□□□□□□□□□□		
		□□ □□□ ***(b)***	□□□ ***(c)***	□□# □□□ □□□□□ ***(d)***	□□□□ ***(e)***	□□# □□□□□□□ ***(f)***
2012	2,767	2,755	99.6%	12	0.4%	0
2013	119,178	110,696	92.9%	8,430	7.1%	52
2014	105,943	95,489	90.1%	10,415	9.8%	39
201	123,259	113,84	92.4	9,380	7.6%	35

5		4	%			
2016	86,280	78,288	90.7%	7,947	9.2%	45
2017	30,223	25,637	84.8%	4,537	15%	49
2018	20,181	9,568	47.4%	8,731	43.3%	1,882
[illegible]	**487,831**	**436,277**	**89.4%**	**49,452**	**10.1%**	**2,102**

[illegible]

4.8 [illegible] 2015 [illegible] 2016 [illegible] 2017 [illegible] 5 [illegible] **3.13** [illegible]

4.9 [illegible]2014[illegible]16[illegible]2019[illegible]3[illegible]90%[illegible]**4.7**[illegible]**3**[illegible]**(d)**[illegible]**(c)**[illegible]

[illegible]

4.10 [illegible]2012[illegible]2018[illegible]2019[illegible]3[illegible]49,452[illegible]**4.7**[illegible]**3**[illegible]**(d)**[illegible]**4**[illegible]

[illegible] 4 [illegible]

[illegible]	**[illegible] 2019 [illegible] 3 [illegible] *(a)* *(=(b)+(c)+(d))***	**[illegible]**		
		[illegible] *(d)* [illegible] *(b)*	**[illegible] *(c)***	**[illegible] *(d)***
2012	12	11	0	1
2013	8,430	7,775	139	516
2014	10,415	9,780	197	438
2015	9,380	9,002	184	194
2016	7,947	7,655	175	117
2017	4,537	4,251	60	226
2018	8,731	8,602	111	18
[illegible]	**49,452**	**47,076**	**866**	**1,510**

		(95%)△	**(2%)△**	**(3%)△**

△ [illegible](a)[illegible]

[illegible]

4.11 [illegible] **2.6** [illegible] 2019 [illegible] 3 [illegible] 10 [illegible]

4.12 [illegible] **2.7** [illegible]

4.13 [illegible] 2019 [illegible] 3 [illegible] 2012 [illegible] 2018 [illegible] **5**[illegible]

[illegible] **5** [illegible]

	[illegible] **2019** [illegible] **3** [illegible]		[illegible]
(a)	[illegible] 2012 [illegible] 2018 [illegible]		485,729
(b)	[illegible] *(a)* [illegible] 2019 [illegible] 3 [illegible]		318,168
(c)	[illegible] *(b)* [illegible]		212,880
(d)	[illegible] *(b)* [illegible] # [illegible]	[illegible] (= *(e)* + *(f)*)	90,401
(e)		[illegible]	56,423
(f)		[illegible]	33,978
(g)	[illegible] *(f)* [illegible]	[illegible] (= *(h)* + *(i)*)	2,852
(h)		[illegible]	2,130
(i)		[illegible]	722

(j)	[illegible]*(i)*[illegible]	[illegible](=*(k)*+*(l)*)	43
(k)		[illegible]	17
(l)		[illegible]	26
(m)	[illegible]		26

\# *[illegible] 2012 [illegible] 2017 [illegible] 10 [illegible] 262 [illegible] 2017 [illegible] 10 [illegible] 120 [illegible] 2017 [illegible] 142 [illegible]*

4.14 [illegible] 2019 [illegible] 3 [illegible] 109 [illegible] 22 [illegible]

[illegible]

4.15 [illegible] **3.5** [illegible] **2.8-2.9** [illegible]

4.16 [illegible] 2017 [illegible] **3.13** [illegible] **3.5-3.7** [illegible] 2012 [illegible] 2016 [illegible] 2017 [illegible] 2018 [illegible] **6-7**[illegible]

[illegible] 6 [illegible]

		2017 [illegible] ***(x)***	**2018** [illegible] ***(y)***
(a)	[illegible]	5,960	3,790

(b)	[illegible](a)[illegible]		1,400	834
(c)	(b)[illegible]	0-30 [illegible]	391 (28%)*	162 (19.4%)*
(d)		31-60 [illegible]	389 (28%)*	237 (28.4%)*
(e)		61-90 [illegible]	210 (15%)*	128 (15%)*
(f)		[illegible] 90 [illegible]	410 (29%)*	307 (37%)*
(g)	(a)[illegible]		4,560 (77%)△	2,953 (78%)△
(h)	(a)[illegible] 2019 [illegible] 3 [illegible]		0	0

* *[illegible](b)[illegible]*

△ *[illegible]((a)[illegible])[illegible]*

4.17 [illegible] **3.6-3.7** [illegible] 30 [illegible]

[illegible] 7 [illegible]

[illegible]	[illegible] **(a) (=(b)+(c))**	[illegible] **(b)**	[illegible] **(c)**
2017	1,439	1,373 (95%)*	66 (5%)*
2018	1,082	1,047 (97%)*	35 (3%)*

* *[illegible](a)[illegible]*

[illegible]

4.18 [illegible]**2.8-2.9**[illegible]

4.19 [illegible]2012[illegible]2018[illegible]**8**[illegible]

[illegible]**8**[illegible]

[illegible]

	[illegible] ***(a)***	[illegible]**2018**[illegible]**12**[illegible]#[illegible] ***(b)***	[illegible]**2019**[illegible]**3**[illegible]	
			[illegible] ***(c)***	[illegible] ***(d)***
(1)	[illegible]	25	13	3
(2)	[illegible]	8	4	0
(3)	[illegible]	4	3	0
(4)	[illegible]	6	4	0
(5)	[illegible]	19	11	0
(6)	[illegible]	2	1	0
(7)	[illegible]	3	2	0
	[illegible]	**67**	**38**	**3**

 # [illegible]

4.20 [illegible]2019[illegible]3[illegible](b)[illegible]67[illegible]29[illegible]

[illegible] 38 [illegible]

5

[illegible]

5.1 [illegible] **2.1** [illegible] 2012 [illegible] 2018 [illegible] **9**[illegible]

[illegible] **9** [illegible]

[illegible]	[illegible] ***(a)***	***(a)*** [illegible] ***(b)***	[illegible] ***(c)***	[illegible] **2019** [illegible] **3** [illegible] ***(c)*** [illegible]	
				[illegible] ***(d)***	[illegible] ***(e)***
2012	27	25	0	0	0
2013	30	30	0	0	0
2014	20	18	2	0	0
2015	17	17	3	0	2
2016	82*	67	5	1	0
2017	86*	74	7	1	0
2018	69*	57	3	0	0

□□	**331***	**288**	**20 (6%)△**	**2**	**2**

** □2016□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□*
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△ □□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□(a)□□□□□□

5.2 □□□20□□□□□□□□□□□□□□□□□**9**□**(c)**□□□□□□□□□□ □□**8**□□**4.19**□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□ □□□□□□□□□□□□□□□□□□14□□□□□□□□□□□□□□□□□□□□□□ □□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□

5.3 □□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□ □□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□10□□□□□□□□□ □□□□□□□□□□□92%□□□□□□□□□□□□□□□□□□□□□□

6

[illegible]

6.1 [illegible]

(I) [illegible]

6.2 [illegible] 10 [illegible] **2.1-2.2** [illegible] 2012 [illegible] 6 [illegible] 30 [illegible] 5,800 [illegible] 35 [illegible] 2017 [illegible] **4.1** [illegible] **1** [illegible] **4.4** [illegible] 2012 [illegible] 2013 [illegible] 70% [illegible] 2014 [illegible] 1,000 [illegible] 2017 [illegible] 2018 [illegible] 400 [illegible] 2018 [illegible] 26,537 [illegible] 9,846 [illegible] 37% [illegible] **4.6** [illegible] **2** [illegible]

6.3 [illegible] 2014 [illegible] **4.3** [illegible]

6.4 [illegible] **4.2** [illegible] **4.3** [illegible]

6.5 [illegible] 2012 [illegible] 2018 [illegible] 331 [illegible] 288 [illegible] 10 [illegible] **5.1** [illegible] **9**[illegible]**(a)**[illegible]**(b)**[illegible] 10 [illegible] 92% [illegible] **5.3** [illegible] **9** [illegible] 2012 [illegible] 2018 [illegible] 10 [illegible]

6.6 [illegible] 2018 [illegible] 400 [illegible] 16,691 [illegible] **6.2** [illegible] 42 [illegible] 10 [illegible][8] [illegible][9] [illegible] **4.5** [illegible]

(II) [illegible]

6.7 [illegible] **3.11** [illegible] **4** [illegible] **3** [illegible]

6.8 [illegible] 2012 [illegible] 6 [illegible] 30 [illegible] 2015 [illegible] 6 [illegible] **3.12** [illegible] **7** [illegible] 2017 [illegible] 5 [illegible] **3.13** [illegible] 2019 [illegible] 3 [illegible] 2012 [illegible] 49,452 [illegible] **4.7** [illegible] **3**[illegible]**(d)** [illegible] **3**[illegible]**(e)**[illegible] 10%[illegible]

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8 [illegible] 2020 [illegible] 2029 [illegible] 10 [illegible] 10 [illegible] 140 [illegible] 300 [illegible] 2,200 [illegible]

9 [illegible]

6.9 [illegible] 49,452 [illegible] 95% [illegible] **4.10** [illegible] **4** [illegible] **(b)** [illegible] 2% [illegible] **4** [illegible] **(c)** [illegible] 3% [illegible] **4** [illegible] **(d)** [illegible]

6.10 [illegible] 2014 [illegible] 16 [illegible] 2019 [illegible] 3 [illegible] 90% [illegible] **4.9** [illegible] 2014 [illegible] **4.4** [illegible] **1** [illegible] **(b)** [illegible] **4.7** [illegible] **3** [illegible] **(a)** [illegible] 2019 [illegible] 3 [illegible] 2014 [illegible] 9.8% [illegible] **3** [illegible] **(e)** [illegible]

6.11 [illegible]

(III) [illegible] 2012 [illegible] 2016 [illegible]

6.12 [illegible] **2.8-2.9** [illegible]

6.13 [illegible] **3.5** [illegible] 2017 [illegible]

6.14 [illegible] 2012 [illegible] 6 [illegible] 30 [illegible] 2017 [illegible] **3.13** [illegible] 2012 [illegible] 2016 [illegible]

(1) [illegible] 2017 [illegible] 2018 [illegible] **4.16** [illegible] **6** [illegible] **(c)-(f)** [illegible]

(2) □□□□□□□□□□□□□□□□□□□□□□□□2017□2018□□□□ □□**6**□□**(g)**□□□□□

(3) □□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□ □2017□2018□□□□□□**4.17**□□□**7**□**(b)-(c)**□□□

6.15 □□□ □□□□□□□□□□□□□□□□□□□□□□**3.6-3.7**□□□□□□□□□□□□□□□□□□ □□ □□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□**2.8-2.10**□□□□□□ □□□ □□□□□□□□□□□□□□□□□□□□□□□□6.16□□□□□□□□□□□□□□

(IV) □□□□□□□□□□□□□□□□□□□□□

6.16 □2015□8□□□□□□□□□□□□□□□□□□□□□□□**3.7**□□□□□□□ □2017□□□□□□□□□□□□□1,400□□□□□**4.16**□□□**6**□□**(b)**□□**(*x*)** □□□□□780□□□□56%□□□□□□□□□□□□□□□□□**6**□**(*x*)**□□□**(c)-(d)** □□□□□□□□620□□□□44%□□□**6**□**(*x*)**□□□**(e)-(f)**□□□□□□□□□□□ □□□□□□□□□□□□□410□□□29%□□□□□3□□□□□□□□□□□**6**□**(*x*)**□□ □**(f)**□□□□□□□□2018□□□□□□□□□□□□□□□834□□□□□**6**□□**(b)**□□ **(y)**□□□□399□□□□47.8%□□□□□□□□□□□□□□□□□**6**□**(y)**□□ **(c)-(d)**□□□□□□□□435□□□□52%□□□**6**□**(y)**□□□**(e)-(f)**□□□□□□ □□□□□□□□□□□□□□□□□□□307□□□□37%□□□□□□□□□□□□**6**□**(*y*)**□□ □**(f)**□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□

6.17 □□□□□□□□□□□□□□□□□□□□□□□□□□□□□ □□□□□□□□□□□□ □□□□□□□□□□□□□□□□□□□□□□□□

6.18 □□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□30□□□□□ □□□□□□□□□**3.6 – 3.7**□□□**5**□**6**□□□□□□□□30□□□□□□□□□□□□ □□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□**4.17**□□□□□□□□□□□□ □□□ □□□ □□

(V) □□□□□□□□□□□□□□□□□□□□

6.19 □□ **3.5** □□

6.20 □□□ **3.10** □□□

6.21 □□□□□ 2017 □ 2018 □□□□□□□□□□□□□□□ 77% □ 78% □□□□□□□□□□□□□□□□□□□□□□□□ **4.16** □□□ **6** □ ***(x)*** □ ***(y)*** □□□ **(g)** □□□□□□□□□□□□□□□□□□□□□□□□

6.22 □□□□□□□□□□□□□ 2017 □□□□□□ 10% □□□ **3.8** □□□□□□□□□□□□□□□□□□□□□□□□□□□ 2017 □ 2018 □□□□□□□□□□□□□□□□□□□□□□□□ 2.3% □ 2.2% □

6.23 □□

(VI) □□□□□□□□□□□□□□□

6.24 □□ **2.6** □□ **4.13** □□□ **5** □□□□□□□□□□ 2012 □□□□□ 2017 □ 10 □□□□□□ 262 □□□□□□□□□□□ 2017 □ 10 □□□□□□ 120 □□□□□□□□□□□□□□□□□ 142 □□□□□□□ 2017 □□□□□□□□□□□□□□□□□□□□□□□□□ **5** □□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□□

□□

6.25 [illegible]

(1) [illegible] **6.4-6.6** [illegible]

(2) [illegible] **6.8-6.11** [illegible]

(3) [illegible] **6.16-6.18** [illegible]

(4) [illegible] **6.21** [illegible] **6.23** [illegible]

(5) [illegible] **6.22-6.23** [illegible]

(6) [illegible] **6.24** [illegible]

[illegible]

6.26 [illegible]

[illegible]
[illegible]**OMB/DI/420**
2019 [illegible] **8** [illegible]